

# Group Exhibit A

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

# 19W0910.06

AGENCY

☒ IDHR☐ EEOC

CHARGE NUMBER

2019CF0386

**Illinois Department of Human Rights and EEOC**

NAME OF COMPLAINANT (Indicate Mr. Ms. Mrs.)

Shukeitha Jackson

TELEPHONE NUMBER (include area code)

(224) 469-5302

STREET ADDRESS

523 Helmholtz Avenue

CITY, STATE AND ZIP CODE

Waukegan, Illinois 60085

DATE OF BIRTH

MM / DD / YYYY

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)

NAME OF RESPONDENT

AbbVie

NUMBER OF  
EMPLOYEES,  
MEMBERS 15+

TELEPHONE NUMBER (include area

(847) 932-7900

STREET ADDRESS

1 N. Waukegan Road

CITY, STATE AND ZIP CODE

North Chicago, Illinois 60064

COUNTY

Lake

CAUSE OF DISCRIMINATION BASED ON:

Race Retaliation

DATE OF DISCRIMINATION  
EARLIEST (ADEA/EPA) LATEST (ALL)

5/1/18 7/31/18

☐ CONTINUING ACTION

THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:

SEE ATTACHED

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MFP

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 18 DAY OF September, 2018

X

NOTARY SIGNATURE

PATRICIA ALMARAZ  
Official Seal  
Notary Public - State of Illinois  
My Commission Expires Sep 18, 2021

NOTARY STAMP

X

SIGNATURE OF COMPLAINANT

DATE

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief

**Charge Number: 2019C-0386**

**Complainant: Shukeitha Jackson**

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- I. A. ISSUE/BASIS**  
**HARASSMENT – MAY 2018 THROUGH JULY 31, 2018, BECAUSE OF MY RACE, BLACK**
- B. PRIMA FACIE ALLEGATIONS**
- 1. My race is black.**
  - 2. My work performance as an administrator met Respondent's expectations. I was hired by Collabera, Inc. in February 2018, and assigned to work at Respondent.**
  - 3. From May 2018 through July 31, 2018, I was harassed by Cristina Slamski (non-black), a staff member of Respondent. She followed me both at work and outside. She gained access to my cell phone and was listening to my calls.**
  - 4. Similarly situated non-black employees were treated more favorably.**
- II. A. ISSUE/BASIS**  
**DISCHARGE – JULY 31, 2018, BECAUSE OF MY RACE, BLACK**
- B. PRIMA FACIE ALLEGATIONS**
- 1. My race is black.**
  - 2. My work performance as an administrator met Respondent's expectations. I was hired by Collabera, Inc. in February 2018, and assigned to work at Respondent.**
  - 3. On July 31, 2018, I was discharged by Michael Scott (non-black), Manager. The reason given was because it was not working out.**
  - 4. Similarly situated non-black employees whose job performance was comparable to mine were not discharged.**
- III. A. ISSUE/BASIS**  
**DISCHARGE – JULY 31, 2018, IN RETALIATION FOR COMPLAINING ABOUT DISCRIMINATION**
- B. PRIMA FACIE ALLEGATIONS**
- 1. On May 1, 2018, I engaged in a protected activity when I complained about being discriminated.**
  - 2. On July 31, 2018, I was discharged by Michael Scott, Manager. The reason given was because it was not working out.**

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**Complainant: Shukeitha Jackson**

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- 3. The negative employment action followed my protected activity within such a period of time as to raise an inference of retaliatory motivation.**

<b>CHARGE OF DISCRIMINATION</b>		<b>AGENCY</b>	<b>CHARGE NUMBER</b>
This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.		<input checked="" type="checkbox"/> IDHR	2019CF3213
# 19M0808.05		<input type="checkbox"/> EEOC	
<b>Illinois Department of Human Rights and EEOC</b>			
NAME OF COMPLAINANT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)	
Shukeitha Jackson		(847) 281-6706	
STREET ADDRESS	CITY, STATE AND ZIP CODE	DATE OF BIRTH	
523 Helmolz Ave.	Waukegan, Illinois 60085	MM / DD / YYYY	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)			
NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE NUMBER (include area)	
Abbvie, Inc.		(847) 935-1299	
STREET ADDRESS	CITY, STATE AND ZIP CODE	COUNTY	
1 N. Waukegan Rd.	North Chicago, Illinois 60064	Lake	
CAUSE OF DISCRIMINATION BASED ON:		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)	
Race      Retaliation		February 28, 2018, - July 31, 2018,	
		<input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:			
<div style="border: 1px solid black; padding: 5px; width: 25%; float: left; margin-right: 10px;">             Dept. of Human Rights               JUN 29 2020               RECEIVED              By: <i>fa</i> </div> <div style="text-align: center; font-size: 1.2em; font-weight: bold;">SEE ATTACHED</div>			
Page 1 of 4		MTS	
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		SUBSCRIBED AND SWORN TO BEFORE ME	
		THIS <u>22</u> DAY OF <u>June</u> , 2020	
		X NOTARY SIGNATURE	
<div style="border: 2px dashed black; padding: 5px; width: fit-content; margin: 0 auto;"> <b>"OFFICIAL SEAL"</b>  <b>ALEJANDRA ALFARO</b>              Notary Public, State of Illinois              My Commission Expires Oct. 17, 2021  <i>Lake County IL</i> </div> <b>NOTARY STAMP</b>		X SIGNATURE OF COMPLAINANT <u>6/22/2020</u> DATE	
I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief			

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**I. A. ISSUES/BASIS**

**HARASSMENT – FEBRUARY 28, 2018, THROUGH JULY 31, 2018, BASED ON MY RACE, BLACK.**

**B. PRIMA FACIE ALLEGATIONS**

1. My race is black.
2. My performance as Administrative Assistant met Respondent's legitimate expectations. Respondent hired me on February 27, 2018.
3. Beginning on February 28, 2018, and continuing through July 31, 2018, I was harassed in Respondent's workplace by Cristina Slomski (non-black) Administrative Assistant, in that:
  - a. On or about February 28, 2018, Slomski demanded a copy of my employment file because she believed I was not qualified for my position;
  - b. Every week Slomski improperly obtained copies of my time sheets and then claimed I was being paid to do nothing;
  - c. Slomski followed me around and stalked me when I was at Respondent;
  - d. Slomski went through my purse, and discussed the contents with my coworkers;
  - e. In May 2018, Slomski used racial slurs such as "hood rat" to refer to me;
  - f. In May 2018, Slomski began stalking me outside of work;
  - g. Slomski improperly obtained remote access to my company issued laptop computer and email accounts, then actively discussed my computer activities with coworkers;
  - h. On June 27, 2018, I discovered that Slomski had obtained covert access to my personal cellular telephone, and discussed my private conversations with coworkers; and
  - i. On July 31, 2018, Slomski threatened me by walking past my desk while igniting an electric stun gun.
4. The conduct created a hostile intimidating and offensive work environment that substantially interfered with my ability to perform the essential functions of my job.



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**Complainant: Shukeitha Jackson**  
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**II. A. ISSUES/BASIS**

**HARASSMENT – MAY 2018, IN RETALIATION FOR MAKING AN  
INTERNAL COMPLAINT OF RACIAL DISCRIMINATION.**

**B. PRIMA FACIE ALLEGATIONS**

1. In early May 2018, I reported to Michael Scott (non-black) Director of Global Policy Compliance, that Cristina Slomski (non-black) Administrative Assistant, was harassing me based on my race.
2. After May 2018, Slomski's harassment intensified and continued through July 31, 2018, in that:
  - a. Slomski used racial slurs and referenced my complaint stating that she thought I was going to act like a "hood rat" instead of making a professional complaint;
  - b. In May 2018, Slomski began stalking me outside of work;
  - c. Slomski improperly obtained remote access to my company issued laptop computer and email accounts, then actively discussed my computer activities with coworkers;
  - d. On June 27, 2018, I discovered that Slomski had obtained covert access to my personal cellular telephone, and discussed my private conversations with coworkers; and
  - e. On July 31, 2018, Slomski threatened me by walking past my desk while igniting an electric stun gun.
3. The conduct created a hostile intimidating and offensive work environment that substantially interfered with my ability to perform the essential functions of my job and it followed my participation in a protected activity within such a time frame as to raise an inference of retaliatory motivation.

**III. A. ISSUES/BASIS**

**DISCHARGE –JULY 31, 2018, BASED ON MY RACE, BLACK.**

**B. PRIMA FACIE ALLEGATIONS**

1. My race is black.
2. My performance as Administrative Assistant met Respondent's legitimate expectations.

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Complainant: Shukeitha Jackson  
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3. On July 31, 2018, Gerard Sison (non-black) Employee Relations Manager discharged me due to my conflict with Cristina Slomski (non-black) Administrative Assistant.
4. Respondent did not discharge similarly situated non-black employee such as Slomski, under similar circumstances.

**IV. A. ISSUES/BASIS**

**DISCHARGE –JULY 31, 2018, IN RETALIATION FOR MAKING AN INTERNAL COMPLAINT OF RACIAL DISCRIMINATION.**

**B. PRIMA FACIE ALLEGATIONS**

1. In early <sup>4/27/18</sup> ~~May 2018~~, I reported to Michael Scott (non-black) Director of Global Policy Compliance, that Cristina Slomski (non-black) Administrative Assistant was harassing me based on my race.
2. On July 31, 2018, Gerard Sison (non-black) Employee Relations Manager discharged me due to my conflict with Cristina Slomski (non-black) Administrative Assistant.
3. Respondent's adverse action followed my participation in a protected activity within such a time frame as to raise an inference of retaliatory motivation.